

Application No. 10/521,897  
Paper Dated May 21, 2007  
In Reply to USPTO Correspondence of November 20, 2006  
Attorney Docket No. 3961-040483

### **REMARKS**

The Office Action of November 20, 2006 has been reviewed and the Examiner's comments carefully considered. The present Amendment modifies claims 7, 19 and 20 in accordance with the originally-filed specification. No new matter has been added. Accordingly, claims 1-20 remain pending in this application, and claim 1 is in independent form.

Initially, the Examiner has objected to claim 7 for the recitation of a "first" coupling element, as opposed to a "second" coupling element. The Examiner's suggested modifications to this claim have been fully adopted by the foregoing Amendment, and withdrawal of the objection to claim 7 is respectfully requested.

Next, claims 19 and 20 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. Specifically, the Examiner has indicated that the phrase "a box-like structure" in claims 19 and 20 is indefinite, and that this phrase should read "a box-shaped structure". Again, the Examiner's suggested modifications have been fully adopted, and withdrawal of the indefiniteness rejections of claims 19 and 20 is respectfully requested.

Claims 1-20 of the present application stand rejected. Specifically, claims 1-20 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 4,663,922 to Anderson et al. (hereinafter "the Anderson patent"). In view of the following remarks, Applicant respectfully requests reconsideration of these rejections.

The present invention is directed to a coupling apparatus. The coupling apparatus includes a first and second coupling element, each having a first and second end. Further, the

first coupling element and second coupling element are releaseably attachable to each other. The first coupling element includes a mating surface positioned between the first and second ends, a wedging surface on the first end, an engagement surface on the second end and at least one alignment orifice. The second coupling element includes a mating surface that abuts the mating surface of the first coupling element, as well as a wedge member positioned on the first end of the second coupling element having a wedge member surface extending from the second coupling element mating surface. The wedge member of the second coupling element is configured to engage the wedging surface of the first coupling element, and the wedge member includes a distal end positioned lower than a wedge member proximal end. Further, the second coupling element includes at least one alignment member extending from the second coupling element mating surface for extension at least partially through the alignment orifice. Finally, the coupling apparatus includes a locking tab extending from the mating surface. This locking tab is configured to abut the engagement surface at the second end of the first coupling element.

The coupling apparatus of the present invention operates in an entirely different manner than the coupling apparatus of the Anderson patent. In particular, the coupling apparatus of the Anderson patent uses upper and lower panels 34 and 36, together with the V-shaped longitudinal groove 38 formed therebetween, in order to appropriately align the keepers 40 through the respective openings 50. Accordingly, in the Anderson patent, the second coupling element 20, is attached to the first coupling element 22 by guiding the base 28 of the second coupling element 20 into the V-shaped groove 38, such that the keepers 40 extend through the openings 50.

In connection with the operation of the present invention, it is the unique wedge-type arrangement and surfaces that allow the second coupling element 14 to be lowered down and engaged with the first coupling element 12. In this regard, the wedge member surface 50 includes a planar portion 56 and a curved portion 58, which creates a hook-like structure that hooks over and engages the wedging surface 22 of the first coupling element 12. Accordingly, the wedge member includes a distal end positioned lower than a wedge member proximal end to create this structure that hooks over and engages with the wedge surface 22 of the first coupling element 12.

The wedging surface 34 (of the Anderson patent) referred to by the Examiner does not and cannot physically allow for the wedge member 24 of the arrangement of the Anderson patent to be placed over the wedging surface in the same manner as the arrangement of the present invention. Instead, and as discussed, the wedge member 24 slides along and within the wedging surface 34, and notably, wedge surface 26 also slides within and along a lower wedging surface 36. In short, the Anderson patent suggests only an alignment mechanism that uses these wedge surfaces not for engagement and connection, but simply to align the keepers 40 through the holes 50.

The present invention specifically teaches the use of a single wedge member 48 (on the second coupling element 14) and a single wedge surface 22 (on the first coupling element 12), which uses the alignment member 60 to allow for engagement of the wedge structure. Accordingly, the Anderson patent actually teaches away from the structure, arrangement and operation of the presently-invented coupling apparatus, as the keepers 40 of the Anderson patent

cannot be used to effect an alignment function for use in engaging the wedges (within the V-shaped groove), and instead it is the V-shaped groove that allows the keepers 40 to be appropriately aligned into and within the openings 50.

Still further, the Anderson patent does not teach or suggest the use of a locking tab 62, which extends from the mating surface and abuts the engagement surface of the second end of the first coupling element. As contemplated by the present application, the locking tab 62 allows for the final lock between the first and second coupling elements after the alignment members 60 have extended through respective orifices 32, and the wedge member 48 has engaged and hooked over the wedging surface 22. It is this locking tab 62 that ensures a tight connection and locked arrangement between the first and second coupling elements.

The Anderson patent does not include such a locking tab 62. The Examiner refers to element 26, which, as discussed, is an alignment element, which operates to effect guiding of the keepers 40 into the openings 50. Accordingly, the "locking tab" 26 of the Anderson patent cannot be used to lock the coupling elements together. If the locking structure (*see* Fig. 6) on the rear of the first coupling element of the Anderson patent was not used, the second coupling element 20 would simply fall out of and become detached from the first coupling element. In particular, and due to the bevel of the surface 26, the second coupling element 20 would simply slide down the surface 36 and out of engagement. Therefore, surface 26 of the Anderson patent is not a locking tab, as specifically set forth in independent claim 1 of the present application. The Anderson patent does not teach or suggest the use of such a locking tab.


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For these reasons, independent claim 1 is not anticipated by or rendered obvious over the Anderson patent or any of the prior art of record, whether used alone or in combination. There is no hint of suggestion in any of the references cited by the Examiner to combine these references in a manner which would render the invention, as claimed, obvious. Reconsideration of the rejection of independent claim 1 is respectfully requested.

Claims 2-20 depend either directly or indirectly from and add further limitations to independent claim 1 and are believed to be allowable for the reasons discussed hereinabove in connection with independent claim 1. Further, many of these dependent claims add additional structural limitations that are not taught or suggested in the prior art. Therefore, for all these reasons, reconsideration of the rejection of claims 2-20 is respectfully requested.

For all the foregoing reasons, Applicant believes that claims 1-20, as amended, are patentable over the cited prior art and in condition for allowance. Reconsideration of the rejections and allowance of all pending claims 1-20 are respectfully requested.

Respectfully resubmitted,  
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